

Re: In re September 11 Litigation, 21 MC 101 (AKH)

Dear Judge Hellerstein:

I write in my capacity as lead counsel for defendant Massachusetts Port Authority ("Massport") to request the removal of former O'Melveny & Myers LLP attorney Samantha L. H. Cassetta (formerly known as Samantha Hetherington) as counsel of record in the following individual actions from the above-captioned consolidated matter:

- 04-CV-6848 (American Alternative Insurance Corporation, et al. v. AMR Corporation, et al.),
- 04-CV-7240 (Woburn Insurance, Ltd. v. AMR Corporation, et al.),
- 04-CV-7241 (Great Lakes Reinsurance U.K. PLC v. AMR Corporation, et al.), and
- 04-CV-7246 (American Re-Insurance Company v. AMR Corporation, et al.).

Ms. Cassetta has left O'Melveny & Myers LLP and is no longer representing Massport in these four actions or any other actions in the above-captioned consolidated matter.

While preparing notices of appearance for the recent appeal of these actions now before the United States Court of Appeals for the Second Circuit, we learned that Ms. Cassetta is mistakenly listed as the lead attorney and the attorney to be noticed for Massport in the above-listed four actions. We believe that these entries are simply inadvertent clerical errors and therefore seek to correct the docket information. Although Ms. Cassetta was previously listed as

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the counsel of record in the actions prior to her departure from our firm in 2006, we had sought to update Massport's attorney information in all relevant individual cases in the consolidated matter in October 2007 upon the filing of Massport's Notice Adopting Massachusetts Port Authority's Master Answer to Property Plaintiffs' Sixth Amended Master Property Complaint Against Airline and Security Company Defendants in each of the actions under my name in my capacity as lead counsel for Massport. The information in these four actions was not updated. Therefore, we respectfully request the removal of Ms. Cassetta as counsel of record for Massport in the above-listed individual actions. Upon removal, we will then promptly enter notices of appearance to reflect Massport's current counsel of record.

Sincerely,

W. Mark Wood) SE W. Mark Wood

CC: Samantha L.H. Cassetta (via e-mail)